

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

KEVIN MILLER,)	
)	
Plaintiff,)	Case No. 08 CV 3185
)	
vs.)	Judge Coar
)	Magistrate Judge Keys
INTEGRYS ENERGY GROUP, INC.,)	
d/b/a INTEGRYS)	
)	
Defendant.)	

**AGREED MOTION FOR AN EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, Integrys Business Support, LLC (“Integrys”), incorrectly identified as Integrys Energy Group, Inc. d/b/a Integrys in the case caption¹, by its attorneys, hereby moves this Court for an extension of time in which to answer or otherwise plead. In support of its motion, Integrys states as follows:

1. Plaintiff filed his Complaint with this Court on June 2, 2008. In the Complaint, Plaintiff alleges that Integrys discriminated against him because of his gender and age in violation of Title VII of the Civil Rights Act of 1964 and the Age Discrimination in Employment act, respectively.

2. Integrys was served with a Summons and Complaint on or about June 4, 2008.

3. Absent an extension of time, Integrys’ answer or other responsive pleading would be due June 24, 2008.

¹ Plaintiff’s former employer and the proper Defendant in this action is Integrys Business Support, LLC. In a telephone conference on June 17, 2008, Plaintiff’s counsel agreed to file an Amended Complaint that substitutes Integrys Business Support, LLC for Integrys Energy Group, Inc., d/b/a Integrys as the Defendant in this case.

4. Counsel for Integrys was only recently retained and requires an additional two weeks, to and including Tuesday, July 8, 2008, to investigate the allegations of Plaintiff's Complaint before responding to the Complaint.

5. During a telephone conference on June 17, 2008, Plaintiff's counsel, Lisa Kane, stated that she had no objection to this motion.

6. Granting Integrys additional time to answer or otherwise plead would not impose undue delay.

WHEREFORE, Integrys respectfully requests that the Court grant it an extension of time, to and including July 8, 2008, in which to answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

INTEGRYS BUSINESS SUPPORT, LLC

By: s/Staci Ketay Rotman - 06243241
One of Its Attorneys

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Dated: June 20, 2008

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that she filed the foregoing **AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following on this 20th day of June, 2008.

Lisa Kane
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s/Staci Ketay Rotman - 06243241
Staci Ketay Rotman